

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona
Heather J. McDonald
Kimberly M. Maynard

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

TRUST FOR THE BENEFIT OF RYAN TAVLIN;

DORON TAVLIN, in his capacity as Trustee of the
Trust for the Benefit of Ryan Tavlin;

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05232 (SMB)

OMEGA ASSET MANAGEMENT, LLC, and;
RYAN TAVLIN, individually as beneficiary of the
Trust for the Benefit of Ryan Tavlin;
Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants Trust for the Benefit of Ryan Tavlin, Doron Tavlin, Omega Asset Management, LLC, and Ryan Tavlin (“Defendants”), by and through their counsel, Chaitman LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 6, 2010, the Trustee filed, and on March 15, 2011, the Trustee served the Complaint against Trust for the benefit of Ryan Tavlin; Harvey Krauss, in his capacity as Trustee of the Trust for the Benefit of Ryan Tavlin; Doron Tavlin, in his capacity as Trustee of the Trust for the Benefit of Ryan Tavlin; Omega Asset Management, LLC; and Ryan Tavlin, individually as beneficiary of the Trust for the Benefit of Ryan Tavlin.
2. On November 18, 2015 Defendants Trust for the benefit of Ryan Tavlin; Doron Tavlin, in his capacity as Trustee of the Trust for the Benefit of Ryan Tavlin; Omega Asset Management, LLC; and Ryan Tavlin, individually as beneficiary of the Trust for the Benefit of Ryan Tavlin filed and served an amended answer on the Trustee.
3. On March 3, 2016, the Trustee filed a Notice of Voluntary Dismissal of

Defendant Harvey Krauss, in his capacity as Trustee of the Trust for the Benefit of Ryan Tavlin, from the above-captioned adversary proceeding without prejudice.

4. In accordance with Federal Rule of Bankruptcy Procedure 7041, and Federal Rule of Civil Procedure 41(a)(1)(ii), the Parties hereby stipulate to a dismissal with prejudice and without costs of the Trustee's claims against Defendants in the above-captioned adversary proceeding and a dismissal with prejudice of the adversary proceeding.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: June 14, 2016
New York, New York

By: s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Heather J. McDonald
Email: hmcdonald@bakerlaw.com
Kimberly M. Maynard
Email: kmaynard@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

Dated: June 14, 2016
New York, New York

By: s/ Helen Davis Chaitman
CHAITMAN LLP
465 Park Ave.
New York, NY 10022
Telephone/Facsimile: (888) 759-1114
Helen Davis Chaitman
Email: hchaitman@chaitmanllp.com

*Attorneys for Defendants Trust for The Benefit of
Ryan Taylin, Doron Taylin, in his capacity as Trustee
of the Trust for the Benefit of Ryan Taylin, Omega
Asset Management, LLC, and Ryan Taylin,
individually as beneficiary of the Trust for the Benefit
of Ryan Taylin*

SO ORDERED

Dated: June 15th, 2016
New York, New York

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE